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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION  
CHASOM BROWN, *et al.*, individually and  
on behalf of all similarly situated,  
Plaintiffs,  
v.  
GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK  
**[PROPOSED] ORDER GRANTING MOTION TO SEAL**  
Judge: Hon. Susan van Keulen, USMJ

## [PROPOSED] ORDER

Before the Court is the parties' Joint Submission Re: Preservation in Light of Class Certification Order ("Joint Submission"). Having considered the Joint Submission, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Joint Submission Re: Preservation in Light of Class Certification Order	GRANTED as to the portions at:  Pages 3:26-27, 4:1, 4:3-5, 5:24, 6:2-3, 7:11	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including internal metrics, data fields, and processes, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices.

## **SO ORDERED.**

DATED:

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HON. SUSAN VAN KEULEN  
UNITED STATES MAGISTRATE JUDGE